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May 9, 2025

VIA ECF

Honorable J. Brendan Day, U.S.M.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 E. State St,
Trenton, New Jersey 08608

Re: James et al. v. Board of Education of the Franklin Township Public Schools, et al.
Civil Action No.: 3:24-10894 (RK)(JBD)

Dear Judge Day:

This office represents Defendants, Board of Education of the Franklin Township Public Schools (the "Board"), John Ravally, Nicholas Solomon, Rod Brundidge (incorrectly pled as Rod Brundige), and Orvyl Wilson (hereinafter collectively referred to as the "Franklin Defendants"), in the above-referenced matter. Please allow this concise letter to serve as a status update pursuant to Your Honor's Pretrial Scheduling Order of February 13, 2025, in anticipation of the next status conference scheduled for May 14, 2025.

Per Your Honor's Order dated February 19, 2025, counsel for the Franklin Defendants released the contact information for the two individual student defendants. Counsel for Plaintiff then served the two student defendants. Defendant Anthony Holley was served on March 18, 2025, did not answer, and default was entered against him on April 16, 2025. Defendant Makai Howard was served on March 14, 2025. Howard filed an answer *pro se* on May 6, 2025.

Both Plaintiff and the Franklin Defendants have served their respective initial written discovery demands on each other and are finalizing written and documentary discovery. Videos requested by Plaintiffs have been turned over pursuant to the protective Order in place. Plaintiff and the Franklin Defendants expect to produce their discovery by May 25, 2025.

Given that Defendant Makai Howard answered so recently, the time for paper discovery will need to be extended before the parties can commence depositions. As such, we ask the Court to allow for more time to conduct written and documentary discovery. Further, though default was entered against Mr. Holley, we would like to discuss further efforts to give Mr. Holley an opportunity to participate in this litigation as he is a critical witness given the Board's defense that it is not responsible for the criminal conduct of third parties.

HILL WALLACK LLP
ATTORNEYS AT LAW

Page 2

Plaintiff, the Franklin Defendants and Defendant Howard consent to this letter. We thank the Court's attention to this matter and look forward to discussing this matter at the status conference.

Respectfully submitted,
HILL WALLACK LLP
/s/Suzanne M. Marasco
Suzanne M. Marasco, Esq.

SMM:EAR/kj

cc: Avram Frisch, Esq. (via email)
Attorney for Plaintiffs

Makai Howard (via email)
Pro se

Anthony Holley (via email)